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June 5, 2008

**Via Federal Express**

Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street N.W.  
Washington, DC 20463

RE: Your File No. MUR6012

Dear Mr. Jordan:

Please consider this a response by Risch Goss Insinger Gustavel to your letter of May 20, 2008 regarding the enclosed copy of the Complaint in the above-entitled matter filed by Richard W. Kayser. Specifically, this letter responds to paragraphs 1, 2, 3 and 5 of page 3, which appear to be the only paragraphs relating to the partnership of Risch Goss Insinger Gustavel (hereinafter "RGIG").

First, RGIG does not as an entity deliver legal services and does not receive funds for legal services. RGIG provides its name for use by the individuals who make up the partnership. The attorneys perform legal services, collect fees therefore and deposit the same in their own individual bank accounts and not into an account belonging to RGIG.

RGIG does operate the infrastructure for the member lawyers' businesses and for the Jim Risch for U.S. Senate Committee. RGIG rents office space and sub-rents that office space to the member lawyers and to the Jim Risch for U.S. Senate Committee. It also obtains telephone service, internet service, office furniture and other similar office infrastructure items usually associated with the operation of an office. Monthly, the attorneys using the office, and the Jim Risch for U.S. Senate Committee, which is also using the office, pay the costs thereof (at actual cost) on a *pro rata* basis. Since it is at cost, it is at fair market value. RGIG is not an operating law firm but a name under which lawyers do business and an entity to operate an office at cost. There is no commingling of any funds. The Jim Risch for U.S. Senate

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COUNSEL

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Committee pays RGIG a monthly amount for the office services, at cost, as described above.

The Complaint also states in paragraph 2 of page 3 as follows:

One-fourth of that income goes to James E. Risch as a partner and part owner of that law firm.

That allegation is untrue. There is no net income to RGIG. RGIG only incurs expenses and collects sufficient funds to pay those expenses on a *pro rata* basis from the participants.

Paragraph 3 complains that amounts are paid to John Insinger for legal services and FEC compliance. As disclosed in the FEC reports, the complainant is factually correct that Mr. Insinger, as Treasurer of the Jim Risch for U.S. Senate Committee, is paid for his services.

The complainant then goes on, however, to do a purported legal analysis of those payments to Mr. Insinger, which is based upon the premise that those payments are to RGIG and not Mr. Insinger. That analysis is based upon speculation and is not factually correct. None of the fees paid to Mr. Insinger are fees belonging to RGIG since RGIG does not receive any legal fees from any client or any of its members. The fees paid to Mr. Insinger are not shared by the partnership of RGIG or by James E. Risch for that matter. Those fees were not commingled in any accounts of RGIG or of James E. Risch.

The complainant broadly states in paragraph 5:

There appears to be a significant amount of commingling of personal, campaign and business monies between James E. Risch, Jim Risch for U.S. Senate Committee, John Insinger and the law firm of RGIG.

This statement is simply untrue. There is no such commingling. All accounts are separate and the funds are separate. Mr. Kayser does not state where he has obtained facts to make such a serious allegation. He certainly did not get it from us. Indeed he is unknown to us and has had no contact with us.

All of our bank accounts and records are, of course, open to you, and we will voluntarily make them available for your review or audit at any time.

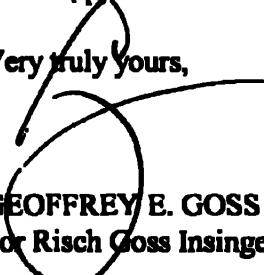
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Should you have any further questions in this matter, please do not hesitate to contact us.

Very truly yours,

  
GEOFFREY E. GOSS  
For Risch Goss Insinger Gustavel

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